

ANN BAVENDER\*  
ANNE GOODWIN CRUMP  
VINCENT J. CURTIS, JR.  
RICHARD J. ESTEVEZ  
PAUL J. FELDMAN  
ROBERT N. FELGAR\*  
RICHARD HILDRETH  
FRANK R. JAZZO  
ANDREW S. KERSTING\*  
EUGENE M. LAWSON, JR.  
HARRY C. MARTIN  
GEORGE PETRUTSAS  
RAYMOND J. QUIANZON  
LEONARD R. RAISH  
JAMES P. RILEY  
KATHLEEN VICTORY  
HOWARD M. WEISS

\* NOT ADMITTED IN VIRGINIA

**FLETCHER, HEALD & HILDRETH, P.L.C.**

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

www.fhh-telcomlaw.com

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JAN 19 1999

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

FRANK U. FLETCHER  
(1939-1985)  
ROBERT L. HEALD  
(1956-1983)  
PAUL D. P. SPEARMAN  
(1936-1962)  
FRANK ROBERSON  
(1936-1961)  
RUSSELL ROWELL  
(1948-1977)  
EDWARD F. KENEHAN  
(1960-1978)

CONSULTANT FOR INTERNATIONAL AND  
INTERGOVERNMENTAL AFFAIRS  
SHELDON J. KRYS  
U. S. AMBASSADOR (ret.)

OF COUNSEL  
EDWARD A. CAINE\*  
MITCHELL LAZARUS\*  
EDWARD S. O'NEILL\*  
JOHN JOSEPH SMITH

WRITER'S DIRECT  
(703) 812-0471  
weiss@fhh-telcomlaw.com

January 19, 1999

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20554

**Re: Amendment of Section 73.202(b)  
Table of Allotments,  
FM Broadcast Stations.  
De Ridder, Louisiana  
MM Docket No. 98-209; DA 98-2639**

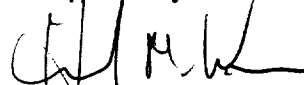
Dear Ms. Salas:

Transmitted herewith, on behalf of Proctor-Williams, Inc., are an original and four (4) copies of its Comments in the above-referenced proceeding.

An extra copy, marked "Please Stamp and Return this Copy to Fletcher, Heald & Hildreth" is enclosed. Please date stamp this copy and return it to our offices.

Should any questions arise concerning this filing, please communicate directly with the undersigned.

Respectfully submitted,



Howard M. Weiss  
Counsel for Proctor-Williams, Inc.

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Enclosures

cc: John C. Trent, Esq. (w/o encl.)

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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JAN 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
Amendment of Section 73.202(b)	)	
Table of Allotments,	)	MM Docket No. 98-209
FM Broadcast Stations.	)	RM-9406
(De Ridder, Louisiana)	)	

To: Chief, Allocations Branch, Mass Media Bureau

**COMMENTS OF PROCTOR-WILLIAMS, INC.**

1. Proctor-Williams, Inc. ("Proctor"), through its counsel, hereby files these comments in response to the Commission's Notice of Proposed Rulemaking (the "Notice")<sup>1</sup>, released November 27, 1998, in the above-captioned proceeding. The Notice proposes to amend the FM Table of Allotments, Section 73.202(b) of the Commission's rules, by substituting Channel 250A for Channel 269A for Station KEAZ(FM) at De Ridder, Louisiana, and modifying the license of Station KEAZ(FM) accordingly.

2. Proctor, licensee of Station KWDX(FM), Silsbee, Texas, supports the proposed amendment to substitute Channel 250A for Channel 269A. Currently, petitioner operates on Channel 269A and is short-spaced to KWDX(FM). Consequently, petitioner cannot operate as a fully-spaced, non-directional, maximum Class A facility. The requested substitution, if

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<sup>1</sup> In the Matter of Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations (De Ridder, Louisiana), MM Docket No. 98-209 (released November 27, 1998).

granted, would remove the short-spacing between KEAZ(FM) and KWDX(FM).

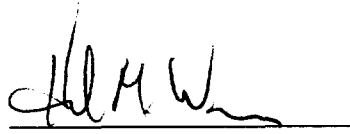
3. Proctor believes that substitution of KEAZ(FM)'s current channel is in the public interest. Not only would it enable KEAZ(FM) to operate as a full Class A facility, as stated in the Notice, but it would significantly increase KEAZ(FM)'s coverage area by approximately 838 square kilometers. The increase would permit service to an additional 7,000 people. Likewise, moving KEAZ(FM) to Channel 250A would permit KWDX(FM) to upgrade by converting to a full power, omnidirectional operation, with correspondingly greater coverage. The proposed substitution is therefore consistent with the FM priorities outlined in *Revision of the FM Assignment Policies and Procedures*, 90 FCC Rcd 2d 88 (1982), and with the Commission's Section 307(b) mandate of providing fair, efficient and equitable distribution of radio services in the United States.

4. WHEREFORE, for the foregoing reasons, Proctor hereby respectfully requests that the Commission GRANT petitioner's request to substitute Channel 250A for Channel 269A at De Ridder, Louisiana.

Respectfully submitted,

PROCTOR-WILLIAMS, INC.

By:

A handwritten signature in black ink, appearing to read 'H M Weiss', written over a horizontal line.

Howard M. Weiss  
Its Counsel

Fletcher, Heald & Hildreth  
1300 North 17th Street  
11th Floor  
Rosslyn, Virginia 22209  
(703) 812-0400

January 19, 1999

ajs/wpdocs/weiss/deridder

**CERTIFICATE OF SERVICE**

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a copy of the foregoing "Comments of Proctor-Williams, Inc." was sent this 19th day of January, 1999, by first-class United States mail, postage prepaid to:

John C. Trent, Esquire  
Putbrese, Hunsaker & Trent, P.C.  
100 Carpenter Drive, Suite 100  
P.O. Box 217  
Sterling, Virginia 20167-0217

  
Barbara Lyle